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Investigation by the Department of Telecommunications)	
and Energy on its own motion, pursuant to G.L. c. 164,)	
§§ 1E, 76 and 93, into Boston Edison Company, Cambridge))	
Electric Light Company and Commonwealth Electric)	
Company, d/b/a NSTAR Electric's service quality filings,)	D.T.E. 01-71A
including but not limited to, their service quality filings)	
submitted in response to Service Quality Standards for)	
Electric Distribution Companies and Local Gas)	
Distribution Companies, D.T.E. 99-84)	
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INSTRUCTIONS

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further or different information with respect to the same is obtained.

5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. The terms "Company" or "Companies" refer to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, d/b/a NSTAR Electric, and NSTAR Gas Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

The following is the Attorney General's FIRST SET of Document and Information Requests in the above referenced docket.

- AG-1-1 Please provide for each of the NSTAR companies, including NSTAR Gas Company, all materials filed in compliance with the Service Quality components of the Department's orders in D.T.E. 99-19. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality benchmarks and any penalty proposals. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-2 Please provide copies of all (internal and external) communications (both written and oral), e-mail, memoranda, and notes of telephone conversations and meetings related to the Department's service quality provisions of the orders in D.T.E. 99-19. This response should include all materials filed and related to the Companies' correspondence and/or filing made on February 23, 2000.
- AG-1-3 Please provide a copy of the "first annual service quality report under the merger plan" filed on April 11, 2001. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality measures and any penalties incurred. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-4 Please provide a copy of the Department's August 22, 2001 letter(s) to NSTAR and/or the Companies referred to in the Company's October 29, 2001 filing in D.T.E. 99-19. See Cover Letter, p. 2, fn. 1. Include copies of all (internal and external) communications (both written and oral), e-mail, memoranda, and notes of telephone conversations and meetings related to the Department's August 22, 2001 letter(s).
- AG-1-5 Using the format of the Companies' October 29, 2001 filing in D.T.E. 99-19, please provide calculations and schedules that are in compliance with the Department's service quality benchmarks, actual performance and reporting requirements as ordered in D.T.E. 99-19 for two distinct periods, September 1, 1999 through August 31, 2000 and September 1, 2000 through August 31, 2001. This response should incorporate the actual 1999 (12 months ended 8/31/99) statistic for ComGas' telephone-call-answering time. Include all supporting

calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.

- AG-1-6 Based on the response to AG-1-5, please provide a calculation of individual penalties and off-sets for each of the two periods for each of the NSTAR companies that comply with the computation of penalties and off-sets required by the Department in its orders in D.T.E. 99-84. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-7 Regarding the Companies' October 29, 2001 filing in D.T.E. 99-19, supported by the testimony of Mr. Henry LaMontagne filed on December 14, 2001, please provide all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality benchmarks and penalty/off-set amounts. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-8 Please provide copies of all (internal and external) communications (both written and oral), e-mail, memoranda, and notes of telephone conversations and meetings related to the Companies' October 29, 2001 filings and Mr. LaMontagne's testimony.
- AG-1-9 Please provide for calendar year 2001 the equivalent of the data filed by the Companies on April 11, 2001 as the "first annual service quality report under the merger plan." If the data is not yet available, please provide an estimate of when the Companies will be able comply with this request and provide the response at that time. Provide all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality benchmarks and penalty/off-set amounts. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-10 Please provide a table detailing the "direct payments of over \$1 million to

customers of Boston Edison” referred to in the Companies’ October 29, 2001 filing in D.T.E. 99-19. Letter, p. 7. The table should identify payments by customer class, geographic location (neighborhood or operating sub-area), basis for payment (lost wages, loss due to lack of refrigeration, etc.), supporting documentation required by Company, dates covered by the payment, and date payment made.

- AG-1-11 Please explain, in detail, how the Company administered the “direct payments” program—how customers were notified of the program, what types of situations were eligible for payment, how the Company determined/validated eligibility, how many customers requested payments (provide the amounts by class and geographic area), how many received payments (provide the amount by class and geographic area), unresolved claims (provide the amount by class and geographic area), and the Company’s plan for or results of audits (internal or external) of the direct payment program.
- AG-1-12 Referring to the Companies’ Service Quality Plan filed November 16, 2001 (as updated November 19, 2001) in D.T.E. 01-71. Please provide the benchmarks and standard deviation calculations separately for each of the NSTAR companies based on data available through calendar year 2001. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality measures and any penalties incurred. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-13 Referring to the Companies’ Service Quality Plan filed November 16, 2001 (as updated November 19, 2001) in D.T.E. 01-71. Please provide the benchmarks and standard deviation calculations for the NSTAR companies “on a consolidated, system-wide basis” based on data available through calendar year 2001. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality measures and any penalties incurred. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-14 Please provide copies of all (internal and external) communications (both written and oral), e-mail, memoranda, and notes of telephone conversations and meetings related to the Companies’ November 16, 2001 and November 19, 2001 filings.

- AG-1-15 Please explain, in detail, how the NSTAR companies' data was consolidated. Identify all data collection methodology differences and how these were overcome in the consolidation process. This response should explain all differences between the statistics provided in response to AG-1-12 and AG-1-13.
- AG-1-16 Please identify the witnesses the Company is planning to have sponsor its Service Quality Plans as filed on November 16, 2001? Provide the names, areas of expertise, professional qualifications and testimony in support of the Companies' filings.
- AG-1-17 Please provide 10 years of statistics and information for each Company for the following reportable items, as required in the Service Quality Plan, sections IV and VIII:
- Staffing Level in compliance with G.L. c. 164, § 1E,
 - CAIDI,
 - Electric Distribution Line Loss,
 - Restricted Work-Day Rate,
 - Damage to Company Property,
 - Annual Major Outage Events,
 - Capital Expenditure Information,
 - Spare Component and Acquisition Inventory Policy and Practice,
 - Poor Performing Circuits,
 - Electric Service Outages, and
 - Other Safety Performance Measures.
- In cases where 10 years of data are not available, provide the data for the years available and explain why older data not available.
- AG-1-18 Please provide the results of all customer surveys conducted by any NSTAR Company during the past 10 years. The results should clearly identify for each survey the purpose of the survey, the dates the survey was conducted, the survey method (telephone, mail, e-mail, in person, etc), how the surveyed group was selected, the statistical validation of the survey, the identity of the survey designer and who actually conducted the survey, tabulated and interpreted the results. Provide copies of each questionnaire or script used.
- AG-1-19 Please provide, separately for each of the NSTAR companies, the following billing data, by customer class, for each of the past 10 years:
- Number of billing cycles in each of the years,
 - Number of bills rendered in each cycle for each year,
 - Number of estimated bills in each cycle for each year,
 - Total billings in each cycle for each year, and
 - Total estimated billings in each cycle for each year.
- If a full 10 years of data is not available for each of the Companies, please provide

the data available.

- AG-1-20 Please provide, separately for each NSTAR company, a 10 year history of billing adjustment amounts by customer class . Identify bad debt write-off amounts separately. Identify billing adjustment amounts related to DTE intervention cases separately. If a full 10 years of data is not available for each of the Companies, please provide the data available. Include all written policies and or guidelines used by Company personnel in adjusting customer bills and any review process related to bill adjustments.
- AG-1-21 Please provide, separately for each of the NSTAR companies, a 10 year history of all “Excludable Major Events,” as defined in the Service Quality Plans filed November 16, 2001. Identify the events in each year by the three categories included in the definition of Excludable Major Event, provide the duration and dates of each event. Describe how the Companies categorize events—who is responsible and provide all written guidelines used to make the determination and any review process employed. If a full 10 years of data is not available for each of the Companies, please provide the data available.
- AG-1-22 Regarding Customer Service Guarantees. Please provide each Companies’ policy regarding customer notification of scheduled service interruptions. Include the definition of a “scheduled service interruption,” the minimum notice required, mehtod of notification (phone, mail), what records are kept and used to validate a customer’s claim of no or inadequate notice?
- AG-1-23 Please provide all historic MAIFI data for each of the NSTAR electric companies. Please explain how this data is/was collected (how recorded, method of recording, to whom it, what level of aggregation used in reporting data, etc.), to whom it was reported (intemally and externally), and if it is no longer being collected, explain why. Include all related procedures, policies and guidelines related to the collection and reporting of outage data used by the Companies.

Dated: January 4, 2002.